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September 28, 2022

VIA ECF

Hon. John R. Tunheim
District Judge
United States District Court
300 South Fourth Street
Minneapolis, MN 55415

**Re: *In re Cattle & Beef Antitrust Litigation*, Case No. 0:20-cv-1319 (JRT/JFD)
Relating to *In re DPP Beef Litigation***

Dear Judge Tunheim:

On July 7, 2022, Direct Purchaser Plaintiffs (“DPPs”), filed their Motion for Final Approval of Settlement Between DPPs and JBS Defendants. ECF No. 601. Among the papers accompanying the motion (and filed in support thereof) was the declaration of the Court-Approved Settlement Administrator (A.B. Data). *See* Declaration of Eric Schachter in Support of Motion for Final Approval of the Class Action Settlement Between Direct Purchaser Plaintiffs and the JBS Defendants (“Schachter Decl.”). ECF No. 605.

Exhibit F of the Schachter Declaration contains a list of all entities (inclusive of affiliated entities) that requested exclusion. *See* Schachter Decl. ¶13, at 4. ECF No. 605. The list erroneously included an entity, Lincoln Provision, Inc., on line 2-71. ECF No. 605-1 at 26-51.

Accordingly, DPPs are filing a Corrected Declaration of Eric Schachter in Support of Motion for Final Approval of the Class Action Settlement Between DPPs and the JBS Defendants, a Corrected Exhibit F, and a Corrected Proposed Order, along with providing your Honor with a Word version of the Corrected Proposed Order, that corrects this error—i.e., removing Lincoln Provision, Inc. from the list of entities that have sought

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exclusion from the Settlement.¹ We respectfully request that the Court enter the Corrected Proposed Order.

Respectfully submitted,

GUSTAFSON GLUEK PLLC

/s/ Michelle J. Looby

Michelle J. Looby (#0388166)

***Interim Co-Lead Counsel for the Proposed
Direct Purchaser Plaintiffs***

MJL/jlh

cc: All Counsel of Record (via ECF)

¹ Because there are no changes to the other exhibits (A-E, and G) to the Schachter Declaration, DPPs are not refiling those exhibits.